

January 22, 2016

Hon. George B. Daniels
United States District Court
Southern District of New York
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New York, NY 10007-1312

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Re: Grubbs v. Safir, Case No. 92-cv-2132 (GBD) – Settlement Discussions Status Report

Dear Judge Daniels:

We write jointly on behalf of Plaintiffs and Defendants to provide an update to the Court as to the status of settlement discussions in the above-referenced case. As set forth in our previous status update letter, after touring the attorney-client interview booths and adjoining areas in the criminal courthouses in Staten Island and Brooklyn, counsel for the parties met in person on December 18, 2015 to discuss potential resolutions.

Since that meeting, the parties have continued their discussions, and on January 19, 2016, Defendants sent Plaintiffs a formal settlement proposal. Plaintiffs are considering that proposal and anticipate providing a response before January 29, 2016. Additional discussions may take place following Plaintiffs' response.

In addition, on January 20, 2016, Defendants made a letter motion to redact limited identified portions of the transcript of October's oral argument. Plaintiffs do not object to this request.

The parties propose to provide the Court with another status update on or before February 26, 2016.

Respectfully submitted,

/s/ Gregory G. Little

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